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Attorneys for Lynn Lloyd and Red Rock Hounds

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE COMPANY,

Plaintiff,

v.

RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock (81)
[sic]; LYNN LLOYD, individually; and
TRACY TURNBOW (Interested Party),

Defendants.

RED ROCK HOUNDS, a Domestic Nonprofit
Corporative Corporation Without Stock; and
BARBARA LYNN LLOYD,

Counterclaimants,

v.

THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE COMPANY;
BEEHIVE INSURANCE AGENCY, INC., a
Utah corporation, doing business as
CERTIFIED INSURANCE SERVICES, INC.,

Counterdefendant.

Case No. 3:20-cv-0272-MMD-WGC

**MOTION BY SCOTT J. TEPPER
TO WITHDRAW AS COUNSEL
OF RECORD FOR DEFENDANTS
AND COUNTERCLAIMANTS**

Pursuant to District of Nevada Local Rule LR IA 11-6(b) and Rule 1.16 of the Nevada Rules of Professional Conduct, Scott J. Teppner, admitted pro hac vice on June 22, 2020, hereby moves the Court for entry of an order granting him leave to withdraw from representing defendants and counterclaimants Red Rock Hounds, Inc., and Barbara Lynn Lloyd in this litigation.

STATEMENT OF FACTS

On July 27, 2020, Mr. Teppner had a conversation with Ms. Lloyd concerning this matter. At the conclusion of the conversation, Ms. Lloyd and Mr. Teppner agreed that it would be best if he withdrew from further representation of the defendants and counterclaimants in this case, subject to Court approval. Their other existing counsel, Richard G. Hill, Esq., and Richard G. Hill, Ltd., will continue to represent the defendants/counterclaimants.

LEGAL STANDARDS

Local Rule LR IA 11-6 provides in relevant part that . . .

(b) If an attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel. The affected client may, but is not required to, file a response to the attorney's motion within 14 days of the filing of the motion, unless the court orders otherwise.

(c) A stipulation to substitute attorneys must be signed by the attorneys and the represented client and be approved by the court. Except where accompanied by a request for relief under subsection (e) of this rule, the attorney's signature on a stipulation to substitute the attorney into a case constitutes an express acceptance of all dates then set for pretrial proceedings, trial, or hearings, by the discovery plan or any court order.

In addition, Rule 1.16 of the Nevada Rules of Professional Conduct governs the termination of representation. It states in relevant part the following:

(a) Except as stated in paragraph (c), a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if:

(3) The lawyer is discharged.

(b) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if:

(1) Withdrawal can be accomplished without material adverse effect on the interests of the client . . .

(c) A lawyer must comply with applicable law requiring notice to or permission of a tribunal when terminating representation. When ordered to do so by a tribunal, a lawyer shall continue representation notwithstanding good cause for terminating the representation.

(d) Upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, surrendering papers and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred. . . .

ARGUMENT

Withdrawal of Mr. Tepper meets all of the aforesaid requirements of this Court's Rules and Nevada's Rules of Professional Conduct. Current co-counsel, Richard G. Hill, Esq., and his firm, will remain remain counsel of record. There should be no delay to the Court or parties, and no prejudice to the clients, occasioned by this withdrawal.

The Court should grant leave to withdraw because the legal standards for withdrawal are met and the clients' and Mr. Hill's endorsements hereon confirm the need for the withdrawal and that Mr. Hill and his firm will continue to represent defendants and counterclaimants.

This motion has been served on all parties of record and there will be no delay of discovery, trial, or any hearing in the case from my withdrawal since discovery has not yet commenced nor has a trial date nor any other hearing date been set.

CONCLUSION

For the foregoing reasons, Mr. Tepper respectfully requests the Court enter an order granting him leave to withdraw as counsel of record for defendants and counterclaimants Barbara Lynn Lloyd and Red Rock Hounds, Inc. Mr. Tepper also requests the Court waive the 14-day requirement of LR IA 11-6(b) based on the clients' endorsement of the request.

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AFFIRMATION Pursuant to NRS 239B.030

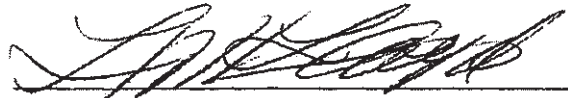
The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 28th day of July, 2020.

Respectfully submitted by:

SCOTT J. TEPPER
RASKIN GORHAM ANDERSON LAW, LLP
11333 Iowa Avenue
Los Angeles, California 90025

I concur in the request and waive the 14 days I have to respond:

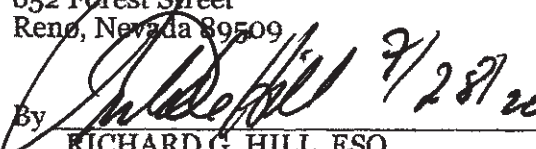


BARBARA LYNN LLOYD, individually
and as an officer of Red Rock Hounds, Inc.

I concur in the request:


RICHARD G. HILL, LTD.
RICHARD G. HILL, ESQ.
652 Forest Street
Reno, Nevada 89509

By

 7/28/20
RICHARD G. HILL, ESQ.
Attorneys for Red Rock Hounds
and Barbara Lynn Lloyd

IT IS SO ORDERED.

DATED: July 29, 2020.


UNITED STATES MAGISTRATE JUDGE